Joyce W. Lindauer State Bar No. 21555700 Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500 Dallas, TX 75201 Telephone: (972) 503-4033 Facsimile: (972) 503-4034

ATTORNEYS FOR DEBTOR

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

\$
JEROME ALBERT GRISAFFI
\$
CASE NO. 19-33855-SGJ
\$
DEBTOR
\$
Chapter 11

#### **OBJECTION TO TRUSTEE'S FINAL REPORT (TFR)**

#### TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Joyce W. Lindauer, counsel for Debtor in the above-titled and -numbered case ("<u>Counsel</u>"), and files this her *Objection to Trustee's Final Report* ("<u>TFR</u>") and would respectfully show the Court as follows:

- 1. On July 1, 2020, this Court entered its Order Approving Amended First and Final Application to Approve Payment of Fees and Expenses of Debtor's Counsel during Chapter 11 Case. (Dkt. No. 107). A copy of that Order is attached hereto as **Exhibit "A."** 
  - 2. On December 20, 2024, Trustee filed the TFR in this case (Dkt. No. 203).
- 3. Nowhere in the TFR is Counsel's administrative expense claim addressed in the TFR. Counsel asserts that funds exist that would ensure payment of the aforementioned administrative expense claim consisting of her fees and expenses in this case. To the extent that the TFR ignores or omits such administrative expense claim, Counsel objects to the TFR.

WHEREFORE, PREMISES CONSIDERED, Counsel respectfully requests the Court to enter an Order requiring the Trustee to amend her Final Report to address the omission of

Case 19-33855-sgj7 Doc 205 Filed 12/23/24 Entered 12/23/24 14:52:16 Desc Main Document Page 2 of 4

Counsel's administrative expense claim, and to ensure that payment of said claim shall be made as appropriate. Counsel further requests that the Court grant to her any such other and further relief to which she may show herself justly entitled.

Dated: December 23, 2024

Respectfully Submitted,

/s/ Joyce W. Lindauer

Joyce W. Lindauer State Bar No. 21555700 Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500 Dallas, TX 75201

Telephone: (972) 503-4033 Facsimile: (972) 503-4034 ATTORNEYS FOR DEBTOR

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 23, 2024, a true and correct copy of the foregoing document was forwarded via the Court's ECF email system to those persons receiving electronic notice in this case.

/s/ Joyce W. Lindauer
Joyce W. Lindauer



CLERK, U.S. BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS

## ENTERED

THE DATE OF ENTRY IS ON THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

**Signed June 30, 2020** 

United States Bankruptcy Judge

#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

\$
JEROME ALBERT GRISAFFI,

\$
CASE NO. 19-33855-sgj
\$
Chapter 7

Debtor.

# ORDER APPROVING AMENDED FIRST AND FINAL APPLICATION TO APPROVE PAYMENT OF FEES AND EXPENSES OF DEBTOR'S COUNSEL DURING CHAPTER 11 CASE

Came on for consideration the Amended First and Final Application to Approve Payment of Fees and Expenses of Debtor's Counsel During Chapter 11 Case (the "Application").

The Court finds that appropriate and adequate notice of the hearing and opportunity to object to the Application have been provided to the Debtor, the United States Trustee, creditors and parties-in-interest in accordance with 11 U.S.C. § 102 and Rule 2002 of the Federal Rules of Bankruptcy Procedure.

Document

Page 4 of 4

After considering the evidence presented and the arguments of counsel, the Court finds and

concludes that the fees sought and expenses incurred by Joyce W. Lindauer Attorney, PLLC,

counsel for the Debtor, were reasonable and necessary to the administration of this case, and that

the relief requested in the Application should be and hereby is granted. It is therefore;

**ORDERED** that the Application is granted; and it is further

ORDERED that Joyce W. Lindauer Attorney, PLLC is awarded compensation and

reimbursement of expenses for the period of November 19, 2019 through April 16, 2020, in the

aggregate amount of \$41,602.87, which consists of \$38,998.00 as compensation for services

rendered and \$2,604.87 in expenses incurred (less the retainer received of \$11,717.00 and a

voluntary reduction of \$5,665.00) as an allowed administrative expense claim in this estate for a

net allowance due from Debtor and estate of \$24,220.87; and it is further

**ORDERED** that Joyce W. Lindauer Attorney, PLLC is hereby authorized to draw down

its retainer in the amount of \$11,717.00.

# # # END OF ORDER# # #

Submitted by:

Joyce W. Lindauer

State Bar No. 21555700

Joyce W. Lindauer Attorney, PLLC 1412 Main Street, Suite 500

Dallas, Texas 75202

Attorneys for Debtor

Order Granting Amended First and Final Application to Approve Payment of Fees and Expenses of Debtor's Counsel During Chapter 11 Case

Page 2